

# ATTACHMENT

## F-1

**ATTACHMENT F-1 - PLAINTIFF WITNESS LIST**

1. Plaintiff reserves the right to call witnesses for rebuttal as needed.
2. Witnesses who shall be called at trial (live and/or by deposition):

**Fact witnesses:**

Jennifer Coker  
c/o Grant Law Office  
Monarch Tower, Suite 2200  
3424 Peachtree Road, NE  
Atlanta, GA 30326

Ms. Coker is the Plaintiff in this action. She will testify regarding her medical care and treatment, as well as the surrounding and related circumstances, the nature, extent, and severity of her injuries and suffering; the physical and mental pain, suffering and discomfort associated with the injuries, the impact of the injuries on her life, including without limitations, the ongoing emotional and physical impact on her life. She will also testify regarding recommendations from her physicians that the filter and fragments not be removed due to the risks associated with same. Lastly, she will testify consistent with her deposition in this matter.

Jason Levy, M.D.  
Northside Radiology  
1000 Johnson Ferry Rd.  
Atlanta, GA 30342

Dr. Levy is an interventional radiologist who will testify regarding his placement of the Recovery filter into Plaintiff. Plaintiff further anticipates Dr. Levy will testify consistent with his medical records and with his deposition taken in this case.

Expert Witnesses:

Rebecca Betensky, Ph.D.  
655 Huntington Avenue  
Building II, Room 421  
Boston, MA 01225

Dr. Betensky is a biostatistician. Dr. Betensky is expected to testify about her analysis and data relating to complication rates of Bard's defective IVC filter, various design failure modes effects analysis documents, and about various filter migration test results. Dr. Betensky will testify consistent with her deposition and expert report. Further, Dr. Betensky will testify about the foundation and bases for her opinions, including her review of medical and scientific literature, Bard documents, and other information she has reviewed and relied upon. Dr. Betensky will also respond to opinions and testimony of defense experts.

David A. Kessler, M.D.  
c/o Grant Law Office

Dr. Kessler is a medical doctor and former FDA commissioner. Dr. Kessler is expected to testify consistent with his expert report and depositions. Further, Dr. Kessler will testify about the foundation and bases for his opinions, including his review of medical and scientific literature, Bard documents, and other information he has reviewed and relied upon. Plaintiff also anticipates that Dr. Kessler will also respond to opinions and testimony of defense experts.

Robert McMeeking, Ph.D.  
c/o Grant Law Office

McMeeking is a materials and mechanical engineer and is experienced in safety, reliability and effectiveness of biomedical implant devices. Dr. McMeeking is expected to testify that the design of the Recovery filter is inherently dangerous and prone to numerous failure modes. There are safer alternative designs which were available to Defendants. Dr. McMeeking is expected to testify and describe alternative designs of IVC filters including

the Simon Nitinol filter, which are feasible and reduce the tendency to tilt, perforate, migrate, fracture and otherwise fail.

Dr. McMeeking is expected to testify about his analyses and calculations which predict stress, strain, and strength of the Recovery vena cava filter. He will explain why the filter testing conducted by Defendants was inadequate and misleading. Further, Dr. McMeeking will testify about the foundation and bases for his opinions, including his review of medical and scientific literature, Bard documents, and other information he has reviewed and relied upon. Dr. McMeeking is also expected to testify about the following:

- The Recovery IVC filter has a design that makes it prone to migration, tilting and perforation/penetration through the vena cava.
- The driving force for tilting is the relaxation of strain energy in the filter.
- Tilting allows arms and legs to spread out, thereby reducing the strain and strain energy in the filter.
- The filter design makes it probable that limbs will perforate into the wall of the vena cava.
- Pressure applied from the arms and legs of the filter provide the driving forces that lead to penetration in the vena cava walls.
- The filter design causes increased pressure from the arms and legs against the vena cava wall.
- The relatively sharp ends of some arms and legs of the IVC filter can press aggressively into the vena cava wall thereby contributing to higher pressure to the vena cava wall when the filter becomes severely tilted.
- A severely tilted filter will likely perforate the vena cava wall.
- The association between failure modes found with Bard filters.

Dr. McMeeking may also respond to opinions and testimony of defense experts. In addition, Plaintiff anticipates that Dr. McMeeking will testify consistent with his expert reports and depositions given to date.

Kush Singh, MD  
c/o Grant Law Office

Dr. Singh is a radiology expert for Plaintiff and is expected to testify regarding his interpretation of numerous medical imaging, including, but not limited to the IVC filter and its fragments, and movement of such fragments. Plaintiff expects that Dr. Singh is knowledgeable regarding the matters that were the subject of his expert disclosure reports, supplemental reports, and his deposition testimony. Dr. Singh will also respond to opinions and testimony of defense experts.

Cam Patterson, M.D.  
c/o Grant Law Office

Dr. Patterson is a cardiology expert for Plaintiff and is expected to testify regarding Ms. Coker's medical care and causation. Plaintiff expects that Dr. Patterson is knowledgeable regarding the matters that were the subject of his expert disclosure reports, supplemental reports, and his deposition testimony. Dr. Patterson will also respond to opinions and testimony of defense experts.

Michael D. Freeman, MedDr, Ph.D., MPH  
c/o Grant Law Office

Dr. Freeman is an expert in forensic medicine and epidemiology and is expected to testify regarding Bard Recovery failure rates alone and in comparison to other IVC filters, and whether there was a greater risk of adverse events and device failure of the Recovery filter. Dr. Freeman is knowledgeable about the matters that were the subject of his expert disclosure report. Dr. Freeman will also respond to opinions and testimony of defense experts.

William A. Hyman, Sc.D., P.E.  
c/o Grant Law Office

Dr. Hyman is a biomedical engineering expert and is knowledgeable about the matters that were the subject of his expert disclosure report. Dr. Hyman will also respond to opinions and testimony of defense experts.

Suzanne Parisian, M.D.  
c/o Grant Law Office

Dr. Parisian is a regulatory expert who is expected to testify regarding Bard's development of commercial IVC filters, interactions with the FDA, quality systems, sale and post-market follow-up, Bard's investigation of adverse events and communications of risks and benefits to physicians and patients. Dr. Parisian is knowledgeable about the matters that were the subject of her expert disclosure reports and prior deposition testimony. Dr. Parisian will also respond to opinions and testimony of defense experts.

Robert O. Ritchie, Ph.D.  
c/o Grant Law Office

Dr. Ritchie is a mechanical engineering expert who is knowledgeable about the matters that were the subject of his expert disclosure report. Dr. Ritchie will also respond to opinions and testimony of defense experts.

Matthew R. Begley, Ph.D.  
c/o Grant Law Office

Dr. Begley is a mechanical engineering expert who is knowledgeable about the matters that were the subject of his expert disclosure report and his deposition taken in the Newton case. Dr. Begley will also respond to opinions and testimony of defense experts.

7. Witnesses who may be called at trial (Live and/or by deposition):

Destiny Pate  
c/o Grant Law Office

Ms. Pate is Plaintiff's daughter. She will testify regarding her observations of Plaintiff's daily issues caused by her Recovery filter and the failures of that filter, the overall impact on her daily activities and quality of life, and Plaintiff's mental and physical condition before and after the implant of her Recovery filter. Ms. Pate will testify regarding the pain, suffering and mental

anguish experienced by Ms. Coker as a result of the Recovery filter, its failure and resulting complications.

Ryan Coker  
c/o Grant Law Office

Mr. Coker is Plaintiff's son. He will testify regarding his observations of Plaintiff's daily issues caused by her Recovery filter and the failures of that filter, the overall impact on her daily activities and quality of life, and Plaintiff's mental and physical condition before and after the implant of her Recovery filter. Mr. Coker will testify regarding the pain, suffering and mental anguish experienced by Ms. Coker as a result of the Recovery filter, its failure and resulting complications.

Sue Wright  
c/o Grant Law Office

Ms. Wright is Plaintiff's mother. She will testify regarding her observations of Plaintiff's daily issues caused by her Recovery filter and the failures of that filter, the overall impact on her daily activities and quality of life, and Plaintiff's mental and physical condition before and after the implant of her Recovery filter. Ms. Wright will testify regarding the pain, suffering and mental anguish experienced by Ms. Coker as a result of the Recovery filter, its failure and resulting complications.

Joel Coker  
c/o Grant Law Office

Mr. Coker is Plaintiff's ex-husband. He will testify regarding his observations of Plaintiff's daily issues caused by her Recovery filter and the failures of that filter, the overall impact on her daily activities and quality of life, and Plaintiff's mental and physical condition before and after the implant of her Recovery filter. Mr. Coker will testify regarding the pain, suffering and mental anguish experienced by Ms. Coker as a result of the Recovery filter, its failure and resulting complications.

Mandey Anglin  
c/o Grant Law Office

Ms. Anglin is Plaintiff's friend. She will testify regarding her observations of Plaintiff's daily issues caused by her Recovery filter and the failures of that filter, the overall impact on her daily activities and quality of life, and Plaintiff's mental and physical condition before and after the implant of her Recovery filter. Ms. Anglin will testify regarding the pain, suffering and mental anguish experienced by Ms. Coker as a result of the Recovery filter, its failure and resulting complications.

Darren R. Hurst, M.D.  
c/o Grant Law Office

Dr. Hurst is a vascular and interventional radiologist expert. Dr. Hurst is expected to testify as to the Defendants' liability and the design problems associated with the IVC filter, causation, and damages. Further, Dr. Hurst will testify about the foundation and bases for his opinions, including his review of medical and scientific literature, Bard documents, and other information he has reviewed and relied upon. Dr. Hurst will also provide foundational testimony for Plaintiff's medical illustrations and animations. Dr. Hurst will also respond to opinions and testimony of defense experts. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his MDL reports and his deposition testimony. Dr. Hurst will also respond to opinions and testimony of defense experts.

Thomas Kinney, MD, MSME  
c/o Grant Law Office

Dr. Kinney is an interventional radiology expert. Dr. Kinney is expected to testify about the general liability of the Bard defendants. Dr. Kinney will further testify consistent with his deposition and expert report in the MDL litigation. Further, Dr. Kinney will testify about the foundation and bases for his opinions, including his review of medical and scientific literature, Bard documents, and other information he has reviewed and relied upon. Dr. Kinney will also respond to opinions and testimony of defense experts.

Derek David Muehreke, M.D.  
c/o Grant Law Office

Dr. Muehrcke is a cardiothoracic and vascular surgeon. Dr. Muehrcke is expected to testify about the liability of the Bard defendants as well as causation and damages caused by the defective IVC filter. Further, Dr. Muehrcke will testify about the foundation and bases for his opinions, including his review of medical and scientific literature, Bard documents, and other information he has reviewed and relied upon. Dr. Muehrcke may also provide foundational testimony for Plaintiff's medical illustrations and animations. Dr. Muehrcke will also respond to opinions and testimony of defense experts.

Sanjeeva Kalva, M.D.  
c/o Grant Law Office

Dr. Kalva is an Interventional Radiologist and a key opinion leader on IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his interactions with Bard, his experience with its filter, and his deposition.

Anne Christine Roberts, MD  
200 W. Arbor Drive  
San Diego, CA 92103

Dr. Roberts is an Interventional Radiologist. She is expected to testify about her experience with IVC filters and will testify consistent with her expert report and deposition given in the MDL litigation.

David Garcia, M.D.  
Professor of Medicine  
University of Washington  
1959 NE Pacific Street  
Seattle, WA 98195

Dr. Garcia is an associate Medical Director of Anti-Thrombotic Therapy and a professor of hematology. He is expected to testify regarding the lack of

efficacy of the Recovery filter, the health hazard evaluation of December 2004, the thrombotic nature of the Recovery filter and IVC filters, determining clots that have been formed by the Recovery filter including those found in the files of Bard in 2004, the Dear Doctor letters presented at this depositions, information received and information expected by physicians regarding the Recovery filter, evidenced based medicine, what is quality evidence as it relates to efficacy and safety, types of evidence, and randomized control trials, and risk/benefit of the Recovery and IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his MDL reports and his deposition testimony. Dr. Garcia will also respond to opinions and testimony of defense experts.

William D. Cleary  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Cleary was a territory manager for Bard in their peripheral vascular division. Plaintiff expects that Mr. Cleary has knowledge and would testify at trial regarding the matters that were the subject of his employment with Bard, the information Bard provided and did not provide to its sales force and to physicians relating to the IVC filters marketed and sold to physicians and hospitals, and specifically what information was provided to him and to the sales representatives regarding Bard's IVC filters and what information they would and what could have conveyed to physicians who would use those devices. Plaintiff expects that his testimony at trial will be consistent with the testimony at his deposition taken on June 16, 2015, in this litigation.

Shari Allen (O'Quinn)  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Allen was the Regulatory Affairs Manager for BPV in 2004 and the Director of Regulatory Affairs and Clinical for BPV in 2005 and 2006. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on November 2, 2010, in *Newton v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2009-019232, and October 9, 2013, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC.

William Altonaga, M.D.

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Dr. Altonaga was a consultant to and acting Medical Director for C.R. Bard beginning in 2001 and into 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on October 22, 2013, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC.

Murray R. Asch, M.D.

c/o Lakeridge Health Corporation  
Director of Interventional Radiology  
580 Harwood Ave. S  
Oshawa, ON L1S 2J4

Dr. Asch is an Interventional Radiologist who was involved in a pilot study to assess the retrievability of the Recovery filter. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his study and work with Bard, as well as his depositions taken on May 2, 2016, in *In re Bard IVC Filters Prod. Liab. Litig.*, MDL No. 2641, United States District Court, District of Arizona (“the Bard IVC Filter MDL”) and January 5, 2011, in *Lindsay, et al. v. C.R. Bard, Inc., et al.*, United States District Court, Southern District of New York, Case No. 1:09-cv-05475-SHS.

Robert M. Carr, Jr.

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Carr has been an employee at BPV since 2002; prior to that, he was an employee at NMT working on filters. At BPV, he was the Program Director for Research & Development from 2002 through 2010, Director Research & Development Biopsy from 2010 through 2012, Senior Director Research & Development Biopsy & Imaging from 2013 through 2014, and Vice President International since 2015. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with NMT and Bard and his depositions taken on March 18, 2016, and January 19, 2017, in the Bard IVC Filter MDL; May 8, 2007, in *Hutson v. C.R. Bard, Inc., et al.*, Commonwealth of Kentucky, McCracken Circuit Court, Division II, Case No.

06-CI-680; March 4, 2010, in *Campbell v. C.R. Bard, Inc.*, Commonwealth of Kentucky, Scott Circuit Court, Division I, Case No. 08-CI-00541; September 23, 2010, in *Vedas v. C.R. Bard, Inc.*, et al., Superior Court of Arizona, Maricopa County, Case No. CV2010-019655; September 14, 2012, in *Albrecht, et al. v. Bard Peripheral Vascular, Inc.*, Circuit Court of Greene County, Missouri, Case No. 1031-cv10504; April 17, 2013, in *Bouldry, et al. v. C.R. Bard, Inc., et al.*, United States District Court, Southern District of Florida, Case No. 12-809-51-CIV-Rosenbaum; October 25, 2013, in *Anderson v. C.R. Bard, Inc., et al.*, United States District Court, Eastern District of New York, Case No. CV11-2632 (DRH); November 5, 2013, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC; December 19, 2013, in *Payne v. C.R. Bard, Inc., et al.*, United States District Court, Middle District of Florida, Orlando Division, Case No. 6:11-cv-01582-Orl-37GJK; October 29, 2014, in *Tillman v. C.R. Bard, Inc.*, United States District Court, Middle District of Florida, Jacksonville, Case No. 3:13-cv-222-J-34-JBT; and December 19, 2014, in *Kilver v. C.R. Bard, Inc.*, United States District Court, Central District of Illinois, Case No. 1:13-cv-01219-MMM-JAG.

Andrzej Chanduskzko  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Chandskzko has been an employee of BPV since 2002; prior to that, he was an employee at NMT working on IVC filters. At BPV, he was a Senior Engineer, Research & Development Staff Engineer from 2004 through 2008, Staff Engineer from 2009 through 2014, and Principal Engineer since 2015. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and NMT, as well as his depositions taken on September 22, 2010, in *Vedas v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-019655, June 21, 2013, in *Anderson v. C.R. Bard, Inc., et al.*, United States District Court, Eastern District of New York, Case No. CV11- 2632 (DRH), October 10, 2013, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJ-WGC, and April 23, 2015, in *Arnold, et al. v. C.R. Bard, Inc., et al.*, United States District Court, Northern District of Texas, Dallas Division, Case No. 5:13-cv-00609-HLH.

David Ciavarella, M.D.  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Dr. Ciavarella has been Vice President Corporate Clinical Affairs at C.R. Bard since 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and depositions taken on March 1, 2011, and August 29, 2012, in *Tyson v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010- 011149, November 12, 2013, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC, and July 29, 2014, in *Coker v. C.R. Bard, Inc., et al.*, United States District Court, Northern District of Georgia, Atlanta Division, Case No. 1:13-cv-0515.

Len DeCant  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. DeCant was Vice President Research & Development for BPV from 2002 to 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on May 24, 2016, in the Bard IVC Filter MDL.

David Dimmit  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Dimmit is the Vice President and Group Controller at C.R. Bard; Plaintiff expects that he is knowledgeable regarding matters that are/were subject to his employment with Bard and his deposition was taken on January 26, 2017 as to the defendants' financial status, assets, and net worth.

Mehdi Syed  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Syed is the Vice President of Operations at Becton Dickinson and was designated by Bard to testify on the subject notices for the deposition relating to punitive damages and Bard's financial condition; Plaintiff expects that he is knowledgeable regarding matters that are/were subject to his employment

with Bard and his deposition was taken on March 2, 2018, as to Defendants' financial status, assets, and net worth.

Mary Edwards  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Edwards was Vice President Regulatory Affairs/Clinical Affairs at C.R. Bard from 1999 to 2005. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on January 20, 2014, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC, and August 19, 2016, in the Bard IVC Filter MDL.

Robert Ferrara  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Ferrara was the Bard sales representative who called on and made presentations to Plaintiff's treating physicians during the relevant time period. Plaintiff expects Mr. Ferrara will testify on the subject matter of his employment at Bard, and consistent with his deposition.

Christopher Ganser  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Ganser was Vice President, Regulatory Science at C.R. Bard from 2005 through 2006 and Vice President Quality, Environmental Services, & Safety from 2007 through 2010. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on February 28, 2011, in *Newton v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2009-019232, September 9, 2013, in *Anderson v. C.R. Bard, Inc., et al.*, United States District Court, Eastern District of New York, Case No. CV11-2632 (DRH), and October 11, 2016, in the Bard IVC Filter MDL.

David Mickey Graves  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Graves was an Engineer at BPV beginning in 2004 to at least 2014. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on February 27, 2014, in *Ocasio, et al. v. C.R. Bard, Inc., et al.*, United States District Court, Middle District of Florida, Tampa Division, Case No. 8:13-cv-01962-DSM-AEP.

Frank Madia  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Madia was employed as a support engineer by Bard in the early 2000's. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in this case on April 1, 2014.

Janet Hudnall  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Hudnall was an employee at BPV from 1998 to 2008, and has recently become employed by Bard again; she held positions as Product Development Engineer, Product Manager, and Marketing Manager. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on November 3, 2010, in *Newton v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2009-019232, and November 1, 2013, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJ-WGC.

Brian Hudson  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Hudson was an employee at BPV from 1999 to 2012; he held positions as Quality Engineer, Senior Risk Manager, and Associate Director Quality Assurance. Plaintiff expects that he is knowledgeable regarding the matters

that were the subject of his employment with Bard and his depositions taken on January 21, 2011, in *Tyson v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-011149, and January 17, 2014, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC.

Krishna Kandarpa, M.D.  
National Institute of Health  
Bethesda, MD 20892

Dr. Kandarpa was the Medical Monitor for Bard's EVEREST Retrievability Study. Plaintiff expects he is knowledgeable about and will provide testimony concerning the EVEREST Study and all documents related to the same, including his observations, his concerns and findings, complications and adverse events that occurred during the study, design and purpose of the study, his recommendations to and interactions with Bard and its representatives/agents based on the study, and all other related facts and circumstances.

Bill Little  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Little was Vice President of Global Marketing at BPV from 2008 through 2011. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on July 21, 2016, in the Bard IVC Filter MDL.

Patrick MacDonald  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. MacDonald is a sales representative and sales trainer at Bard. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on July 29, 2016, in *Austin v. C.R. Bard*, in 17<sup>th</sup> Judicial Circuit, Broward County Florida, Case No. 15-008373 and the Bard IVC Filter MDL.

Chad Modra

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Modra was Director Quality Assurance and Vice President Quality Assurance at BPV from 2011 through 2014. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on March 28, 2013, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJWGC, June 6, 2014, in *Ocasio, et al. v. C.R. Bard, Inc., et al.*, United States District Court, Middle District of Florida, Tampa Division, Case No. 8:13-cv-01962-DSM-AEP, and December 15, 2015, and January 20, 2016, in the Bard IVC Filter MDL.

Daniel Orms

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Orms was an employee of BPV from 1997 through 2012 as a Sales Representative, District Manager, and Regional Manager. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on August 16, 2016, in *Austin v. C.R. Bard*, in 17<sup>th</sup> Judicial Circuit, Broward County Florida, Case No. 15-008373 and the Bard IVC Filter MDL.

Frederick B. Rogers, M.D.

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Dr. Rogers was the author of a large study establishing that IVC filters do not reduce the rate of PE in trauma patients. Plaintiff further expects that he is knowledgeable regarding the matters that were the subject of his deposition taken on July 18, 2017, in *In re: Bard IVC Filters Products Liability Litigation*, No. MD-15-02641-PHX-DGC, and will testify consistent with that deposition. He is also disclosed as an expert, below.

Gin Schulz

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Schulz was Vice Present Quality Assurance at BPV from 2005 to 2011 and in the Quality Assurance department at C.R. Bard since 2011, including

as Vice President Quality Assurance. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on September 13, 2013, in *Anderson v. C.R. Bard, Inc., et al.*, United States District Court, Eastern District of New York, Case No. CV11-2632 (DRH), and January 30, 2014, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJ-WGC.

Carol Vierling  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Vierling was the Director, Regulatory Affairs at BPV from 1994 through 2002. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken on May 11, 2016, in the Bard IVC Filter MDL.

Alison Walsh  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Walsh was a sales representative at Bard from 2003 through 2006. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken on January 23, 2014, in the *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJ-WGC.

Steve Williamson  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Williamson has been President at BPV since 2012. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on September 7, 2016, in the Bard IVC Filter MDL.

Natalie Wong  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Wong has been an employee of BPV since 2004; she has held positions as Quality Engineer, Field Assurance Quality Engineering Manager, Quality

Engineering Manager, and Senior Quality Engineer, New Product Development. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on September 21, 2010, in *Vedas v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-019655, and October 18, 2016, in the Bard IVC Filter MDL.

John Worland, M.D.  
21605 Crestone Needles Drive  
Parker, Colorado 80138

Mr. Worland is an interventional radiologist in Aurora, Colorado at the Medical Center of Aurora. Plaintiff expects that he is knowledgeable regarding his experience with IVC filters and subject matters discussed at his deposition taken on March 16, 2011, in *Bloomquist v. C.R. Bard, et al.* in United States District Court, Western District of Missouri, Case. No. 09-CV-5086-SW-RED.

Stephanie Eaton, M.D.  
960 Johnson Ferry Road, NE, Suite 500  
Atlanta, GA 30342

Dr. Eaton is a pulmonologist who will testify regarding her examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Eaton will testify consistent with her medical records and her deposition taken in this case.

Paul Boyce, M.D.  
Pulmonary & Critical Care of Atlanta  
960 Johnson Ferry Road NE, Suite 500  
Atlanta, GA 30342

Dr. Boyce is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Boyce will testify consistent with his medical records.

Alex D. Truong, MD  
Emory Healthcare  
550 Peachtree St., NE  
Medical Office Tower, Floor 15  
Atlanta, GA 30308

Dr. Truong is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Truong will testify consistent with his medical records.

Howard Silverboard, M.D.  
Pulmonary & Critical Care of Atlanta  
960 Johnson Ferry Road NE, Suite 500  
Atlanta, GA 30342

Dr. Silverboard is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Silverboard will testify consistent with his medical records.

John Puskas, M.D.  
1111 Amsterdam Ave.  
New York, NY 10025

Dr. Puskas is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Puskas will testify consistent with his medical records and with his deposition taken in this case.

Naresh K. Parikh, M.D.  
Georgia Clinic, P.C.  
11912 Jones Bridge Raod  
Alpharetta, GA 30005

Dr. Parikh is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Parikh will testify consistent with his medical records.

Pooja Bardhan, M.D.  
Georgia Cancer Specialists  
Administrative Annex  
1835 Savoy Drive  
Atlanta GA 30341

Dr. Bardhan is a hematologist who will testify regarding her examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Bardhan will testify consistent with her medical records.

Kristina Bowen, M.D.  
Georgia Cancer Specialists  
Administrative Annex  
1835 Savoy Drive  
Atlanta GA 30341

Dr. Bowen is an oncologist who will testify regarding her examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Bowen will testify consistent with her medical records.

Lynn Zemsky, M.D.  
Georgia Cancer Specialists  
Administrative Annex  
1835 Savoy Drive  
Atlanta GA 30341

Dr. Zemsky is a hematologist who will testify regarding her examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Zemsky will testify consistent with her medical records.

Arum Chervu, M.D.  
Vascular Surgical Associates  
61 Whitaker Street, Suite 2100  
Marietta, GA. 30060

Dr. Chervu is a vascular surgeon who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff and his findings

regarding the filter fragments and migration of such fragments. Plaintiff further anticipates Dr. Chervu will testify consistent with her medical records.

John Sparti, D.O.  
Dallas Family Practice Center  
318 Main St.  
Dallas, GA 30132

Dr. Sparti is a family medicine physician who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Sparti will testify consistent with his medical records and his deposition taken in this case.

John Murray, M.D.  
Emory Pulmonology Clinic  
555 Peachtree St.  
Medical Office Tower Floor 15  
Atlanta, GA 30308

Dr. Murray is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Murray will testify consistent with his medical records.

Wissam Jaber, M.D.  
Emory Midtown  
555 Peachtree St.  
Medical Office Tower Floor 16  
Atlanta, GA 30308

Dr. Jabar is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Jabar will testify consistent with his medical records.

Sriram Paramesh, M.D.

Piedmont Physicians Pulmonary & Sleep Medicine of Marietta  
660 Cherokee Street Northeast, Suite 200  
Marietta, GA 30060

Dr. Paramesh is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Paramesh will testify consistent with his medical records.

Preethi Natarajan, M.D.

Douglas Neurology Associates  
4586 Timber Ridge Dr.  
Douglasville, GA 30135

Dr. Natarajan is a neurologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Natarajan will testify consistent with his medical records.

Lee Brian Padove, M.D.

Northside Cardiology  
1000 Johnson Ferry Rd.  
Atlanta, GA 30342

Dr. Padove is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Padove will testify consistent with his medical records.

Paul Sutej, M.D.

980 Jonson Ferry Rd., Suite 220  
Atlanta, GA 30342

Dr. Sutej is a rheumatologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Sutej will testify consistent with his medical records.

Mujeeb A. Jan, M.D.  
705 Dixie Street, #410  
Carrollton, GA 30117

Dr. Jan is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Jan will testify consistent with his medical records.

Steven Eisenberg, M.D.  
1100 Johnson Ferry Road  
Center Pointe 2, Suite 450  
Atlanta, GA 30342

Dr. Eisenberg is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Eisenberg will testify consistent with his medical records.

Sharon K Rim, M.D.  
Northside Hospital Radiology  
1000 Johnson Ferry Rd.  
Atlanta, GA 30342

Dr. Rim is a radiologist who will testify regarding her interpretation of radiology imaging of Plaintiff.

Praveen Reddy, M.D.  
Northside Hospital Radiology  
1000 Johnson Ferry Rd.  
Atlanta, GA 30342

Dr. Reddy is a radiologist who will testify regarding his interpretation of radiology imaging of Plaintiff.

Mujeeb Jan M.D.  
Tanner Heart & Vascular  
690 Dallas Highway, Suite 104  
Villa Rica, GA 30180\

Dr. Jan is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Jan will testify consistent with his medical records.

John M. Maloney, III, M.D.  
5669 Peachtree Dunwoody Rd., Suite 315  
Atlanta, GA 30342

Dr. Maloney is an infectious disease physician who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Maloney will testify consistent with his medical records.

Blake Spain, M.D.  
2000 Health Park Drive  
ICC/HCA Healthcare  
Brentwood, TN 37027

Dr. Spain is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Spain will testify consistent with his medical records.

Alan Plummer, M.D.  
Emory Healthcare  
1365 Clifton Rd.  
Atlanta, GA 30322

Dr. Plummer is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Plummer will testify consistent with his medical records.

Phyllis Tong, M.D.  
57 Executive Park South NE, Suite 390  
Atlanta, GA 30329

Dr. Tong is an internist who will testify regarding her examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Tong will testify consistent with her medical records.

David Finkleman, M.D.  
Atlanta Gastroenterology  
144 Bill Carruth Parkway, Suite 3600  
Hiram, GA 30141

Dr. Finkleman is a gastroenterologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Finkleman will testify consistent with his medical records.

Dale C. Strasser, M.D.  
Emory Healthcare  
1441 Clifton Road, #236  
Atlanta, GA 30322

Dr. Strasser is a physiatrist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Strasser will testify consistent with his medical records.

Wissam A. Jabbar, M.D.  
The Emory Clinic  
550 W. Peachtree Street, NW, 6<sup>th</sup> Floor  
Atlanta, GA 30308

Dr. Jabbar is an interventional cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Jabbar will testify consistent with his medical records.

Hector Dourron, M.D.  
Hamilton Healthcare  
1109 Burleyson Rd., Suite 202  
Dalton, GA 30720

Dr. Dourron is a vascular surgeon who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Dourron will testify consistent with his medical records.

Aaron Cann, M.D.  
Quantum Radiology  
790 Church St., Suite 400  
Marietta, GA 30060

Dr. Cann is a radiologist who will testify regarding his interpretation of radiology imaging of Plaintiff.

Jay S. Miller, M.D.  
Emory Midtown Clinics  
550 Peachtree Street Northeast  
Medical Office Tower, Floor 10, Suite 1085  
Atlanta, GA 30308

Dr. Miller is a vascular surgeon who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Miller will testify consistent with his medical records.

Laura Peno Green, M.D.  
CaroMont Pulmonary Medicine  
934 Cox Road  
Gastonia, NC 28054

Dr. Peno Green is a pulmonologist who will testify regarding her examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Peno Green will testify consistent with her medical records.

Harvey Sacks, M.D.  
Wellstar Cardiovascular Medicine  
144 Bill Carruth Parkway, Suite 4200  
Hiram, GA 30141

Dr. Sacks is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Sacks will testify consistent with his medical records.

Neal Osborn, M.D.  
Atlanta Gastroenterology  
144 Bill Carruth Parkway, Suite 3600  
Hiram, GA 30141

Dr. Osborn is a gastroenterologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Osborn will testify consistent with his medical records.

Vineet Dua, M.D.  
144 Bill Carruth Parkway, Suite 4200  
Hiram, GA 30141

Dr. Dua is a cardiologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Dua will testify consistent with his medical records.

Rohit Panchal, M.D.  
Cherokee Lung & Sleep Associates  
55 Whiticher St. NE  
Marietta, GA 30060

Dr. Panchal is a pulmonologist who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Panchal will testify consistent with his medical records.

David Fowler, M.D.  
5555 Peachtree Dunwoody Rd., Suite 101  
Atlanta, GA 30342

Dr. Fowler is a orthopedic surgeon who will testify regarding his examinations, care, treatment, observations and diagnosis of Plaintiff. Plaintiff further anticipates Dr. Fowler will testify consistent with his medical records.

Brett Baird  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Baird was a Senior Product Manager for BPV in 2007 and a Marketing Manager for BPV from 2008 through 2011. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on June 9, 2016, in the Bard IVC Filter MDL.

Brian Barry  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Barry was the Vice President Regulatory/Clinical Affairs for Bard Access Systems from 1994 through 1997, Vice President Corporate Regulatory Affairs for C.R. Bard from 1997 through 2000, and Vice President of Regulatory Affairs and Clinical Affairs for C.R. Bard from 2003 to 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on January 31, 2014, in *Jones v. C.R. Bard, Inc.*, United States District Court, Northern District of Texas, Dallas Division, Case No. 3:13-cv-00599-K.

Kevin Boyle  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Boyle was Vice President of Research & Development at BPV from 2013 through 2015. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on February 2, 2017, in the Bard IVC Filter MDL.

Gary S. Cohen, M.D.  
Temple University  
Medicine Education and Research Building (MERB)  
3500 N. Broad Street  
Philadelphia, PA 19140

Dr. Cohen is an Interventional Radiologist at Temple University Hospital. He was a consultant and key opinion leader for Bard on IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his deposition taken on January 25, 2017, in the Bard IVC Filter MDL.

Robert Cortelezzi  
/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Cortelezzi was an employee at BPV from approximately 1990 to 2008; he was a Regional Manager from 2004 through 2008. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on November 11, 2016, in the Bard IVC Filter MDL.

Thomas Ferari  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Ferari was working as a contract Engineer for BPV since 2003. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken in this case on April 2, 2014 and in *Vedas, et al. v. C.R. Bard, Inc., et al.*, *Vedas v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-019655, and October 20, 2010.

Kay Fuller  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Fuller was Senior Regulatory Specialist at BPV from 1999 through 2004. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on November 9, 2010, in *Newton v. C.R. Bard, Inc., et al.*, Superior Court of Arizona,

Maricopa County, Case No. CV2009-019232, and January 11, 2016, in the Bard IVC Filter MDL.

Brooke Gillette  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Gillette was sales representative at C.R. Bard from 2003 through 2006. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken on July 11, 2014, in the *Rackliff v. C.R. Bard, et al.*, Superior Court of Arizona, Maricopa County, Case no. CV2011-021206.

Holly Glass  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Glass was Vice President Government & Public Relations at C.R. Bard from 2002 through 2009. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken on September 23, 2016, in the Bard IVC Filter MDL.

Jason Greer  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Greer was a Sales Representative and then District Manager at BPV from 1999 through 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on June 20, 2010, in *Newton v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2009-019232, October 22, 2010, in *Vedas v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-019655, August 11, 2014, in *Barkley, et al. v. C.R. Bard, Inc., et al.*, Arizona Superior Court, Maricopa County, Case No. CV2011-021250, and September 26, 2011, in *Tyson v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-011149.

John Lehmann, M.D.  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Dr. Lehman was Group Medical Director and Vice President of Medical Affairs for C.R. Bard from 1991 to 1995; he was a consultant and acting Medical Director for C.R. Bard in 2003 and 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on April 2, 2013, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJ-WGC, and all related cross-noticed cases and August 7, 2014, in *Coker v. C.R. Bard, Inc., et al.*, United States District Court, Northern District of Georgia, Atlanta Division, Case No. 1:13-cv-0515.

Frank Lynch, M.D.  
Penn State College of Medicine  
500 University Drive  
Hershey PA 17033

Dr. Lynch is an Interventional Radiologist at Penn State Hospital. He was a consultant and key opinion leader for Bard on IVC filters. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his relationship with Bard and his deposition taken on January 30, 2017, in the Bard IVC Filter MDL.

John McDermott  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. McDermott was President of BPV from 1996 through 2006. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on November 1, 2010, in *Tyson v. C.R. Bard, Inc., et al.*, Superior Court of Arizona, Maricopa County, Case No. CV2010-011149, and February 5, 2014, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC.

Patrick McDonald  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. McDonald is an employee of BPV as a Sales Representative and Field Sales Trainer. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his deposition taken on July 29, 2016 in the Bard IVC Filter MDL.

Abithal Raji-Kubba  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Raji-Kubba was Vice President Research & Development at BPV from 2007 through 2010 and Vice President Lutonix Technology Center from 2011 through 2012. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her deposition taken on July 18, 2016, in the Bard IVC Filter MDL.

Michael Randall  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Randall has been an employee of BPV in the Research & Development department since 2006; he has held several positions, including Engineer, Program Manager, Associate Director, and Director. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on January 18, 2017, and February 2, 2017, in the Bard IVC Filter MDL.

Kim Romney  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Romney has been an employee of BPV since 2011 and is presently a Senior Product Manager for Ports and Filters. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard and her depositions taken on August 30, 2016, September 7, 2016, and January 18, 2017, in the Bard IVC Filter MDL.

Jack Sullivan

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Sullivan was an employee at BPV from 1994 to 2013; he was in the Sales department and held positions including District Manager and Regional Manager. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on September 16, 2016, and November 3, 2016, in the Bard IVC Filter MDL.

Alex Tessmer

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Tessmer was an employee and engineer at BPV in the Research & Development department from 1997 through 2004. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on June 12, 2013, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJ-WGC.

Richard Bliss

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Bliss was a Complaint Manager for Bard. Plaintiff expects that he is knowledgeable regarding the subject matters of his employment and his deposition taken on March 3, 2014.

Doug Uelmen

c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Uelmen was an employee at C.R. Bard and then BPV from approximately 1981 through 2005; he was Vice President Quality Assurance at BPV from 2003 through 2005. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken in this case on May 13, 2014 and on October 4, 2013, in *Giordano v. C.R. Bard, Inc., et al.*, Superior Court of California, San Diego County, East County Regional Center, Case No. 00069363-CU-PO-EC.

Melanie Vilece Sussman  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Vilece was a medical device sales representative at C.R. Bard beginning in February 1999 until 2013. Plaintiff expects that she is knowledgeable regarding the matters that were the subject of her employment with Bard

Don Hill  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Hill was a field manager for C.R. Bard. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard

John Van Vleet  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Van Vleet has been the Vice President Regulatory Affairs/Clinical Affairs at BPV since 2007. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his depositions taken on September 29, 2016, and January 17, 2017, in the Bard IVC Filter MDL.

Bryan Vogel  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Vogel has been a Clinical Specialist II for Bard since 2012. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on August 15, 2017, in the Bard IVC Filter MDL.

Stephanie Klocke  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Ms. Klocke was a Senior Research & Development Associate Director of Engineering at Bard. Plaintiff expects that she is knowledgeable regarding the

matters that were the subject of her employment with Bard and any deposition she has given in the Bard IVC Filter MDL.

Michael C. Warren  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Warren was Vice President of Human Resources at BPV and sat on the Executive Committee. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition given in the Bard IVC Filter MDL.

John Weiland  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Weiland has been the President and Chief Operating Officer of C.R. Bard throughout the relevant time period. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on April 23, 2014, in *Phillips v. C.R. Bard, Inc.*, United States District Court, District of Nevada, Case No. 3:12-cv-00344-RCJWGC.

John Wheeler  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Wheeler has been employed in the Quality Assurance department at BPV since 2012. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and his deposition taken on July 29, 2016, in the Bard IVC Filter MDL.

Mark Wilson  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Wilson worked in the Sales department at BPV from 2006 through 2010 as a sales training manager. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and the deposition taken on January 31, 2017, in the Bard IVC Filter MDL.

Timothy Fisher  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Fisher was a territory and fields sales manager for Bard. Plaintiff expects that Mr. Fischer has knowledge and would testify at trial regarding the information Bard provided and did not provide to its sales force and to physicians relating to the IVC filters marketed and sold to physicians and hospitals and specifically what information was provided to him and to the sales representatives reporting to him regarding Bard's IVC filters and what information they would and what could have conveyed to physicians who would use those devices. Plaintiff expects that his testimony at trial will be consistent with the testimony at his deposition taken on March 29, 2017, in the MDL.

Hugh Magee  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Magee was a sales representative for Bard Peripheral Vascular Incorporated ("BPV") at the time of and preceding the implantation of the filter in Plaintiff. Plaintiffs expect that his testimony at trial will be consistent with his deposition taken on October 17, 2017, in the Bard IVC Filter MDL.

Harvey W. Collins  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Collins was a staff engineer at Bard. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and the deposition given in the *Vedas* matter.

Adrian Ravenscroft  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Mr. Ravenscroft is a former employee of NMT who worked on the Recovery Filter development team from 1996 to 1999. In this position, Mr. Ravenscroft developed the patent for the Recovery® Filter and oversaw product development occurring during the time of his employment. Plaintiff expects that he is knowledgeable regarding the matters that were the subject of his employment with Bard and the deposition taken on October 21, 2010.

Scott Trerotola, M.D.  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Dr. Trerotola is an interventional radiologist who has been involved in clinical trials involving IVC filters and who has written articles about IVC filters. He consulted with Bard regarding design and development of the Recovery filter. Plaintiff expects that his testimony at trial will be consistent with his deposition testimony of November 15, 2010.

Piotr Sobieszczyk, M.D.  
c/o Counsel for Bard Peripheral Vascular and C.R. Bard

Dr. Sobieszczyk is an interventional cardiologist who is an expert witness for the Defendants. Plaintiff expects his testimony at trial will be consistent with his deposition testimony of May 27, 2015 and his expert disclosures.

Any of Plaintiff's other treating physicians and associated staff not already identified who may testify regarding issues of her care, treatment, and alleged damages.

Any and all individuals with knowledge of Ms. Coker's health history.

Any individuals identified by the parties, in documents produced by other parties in initial disclosures or other discovery responses, or in documents produced in the MDL.

Any other witnesses deposed or who will be deposed in this action, in other IVC filter cases, and/or in the MDL.

Records custodians for all medical providers, hospitals, pharmacies, employers.

Any and all individuals designated as witnesses by Defendants.